

Exhibit F

Donna Ruth Atlas

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
ELAINE E. MANDELKOW., et al.,

AFFIDAVIT OF
DONNA RUTH ATLAS

Plaintiffs,

20-CV-00315 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF CALIFORNIA)

: SS.:

COUNTY OF SAN DIEGO)

DONNA RUTH ATLAS, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 1910 Jag Court, El Cajon CA 92059.

2. My current age is 68, having been born on August 2, 1953.

3. I am the wife of Keith Edward Atlas, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My husband passed away from lung cancer on April 4, 2014, at the age of 58. It was determined by the World Trade Center Health Program that this illness was causally connected to his exposure to toxins resulting from the 9/11 terrorist attacks.

5. Keith and I knew each other for forty years. He was my best friend and the love of my life. We traveled back and forth for four years from New York to California, before we finally got married in 2007. We enjoyed life. When he was here in California, we loved to go to the beach. He loved the water. We would just enjoy everything together—going out to eat, walking on the beach, everything. Whatever California had to offer; we would take advantage of. Plays, movies, and spending time with our families.

6. Keith was an FDNY firefighter, as were many of his family members. His brother, Greg Atlas, was in the first tower before it collapsed, and his body was never found. Keith wasn't working on 9/11, but he was worried about his brother, so he drove down to the World Trade Center site to go searching for him. Keith was searching through the rubble for about a week or so. He said it was a bizarre scene, that you couldn't even get your bearings straight because you were surrounded by black smoke and rubble on the pile. Greg's widow explained to me how horrible it was down there. The firemen had no masks, nothing protective to keep them out of harm's way.

7. In around the summer of 2013, Keith was back east, visiting his family. His sister was a World Trade Center Health Program nurse, and she recommended that Keith go and get checked out. So, he did. Within an hour of getting home, the doctors called him and said you need to come in. And that's when they found the tumor in his lungs, right near his heart. We had no idea anything was wrong; we were shocked. He was treated at Sloan Kettering. He did two types of chemotherapy with a steroid, then another treatment. Keith would schedule his cancer treatments on the weekends, and I would fly back and forth from California to New York to be with him for them. He was staying with his parents, who drove him down from their home in Middletown, New York, to NYC for the treatments.

8. I felt like a robot. I tried to go through the everyday motions because I had to. But my heart was breaking because I couldn't be with him. I tried to hold down my job, take care of the house, and do what was best for Keith. Knowing what he was going through, it was hard. He was in a lot of pain. It's devastating for any caretaker. And I wasn't even with him the whole time.

9. Ultimately, I wanted to be the one to take care of him, and Keith wanted to come back to California. In December 2013, he was able to come home for Christmas. He didn't want to be in New York anymore. The chemotherapy took everything out of him. He was okay for the first few days after coming home, but soon after he was wiped out. He was in so much pain. When Keith came home, I took time off work to take care of him. Keith had to go to the emergency room for two weeks in January 2014, so I had to take time off work for that. Keith lived for only another few months.

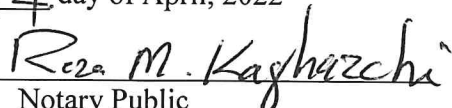
10. I wouldn't wish what Keith went through on anyone. There wasn't a kinder or gentler man that I've ever met. He also was an outstanding fireman. All the Atlases are firemen,

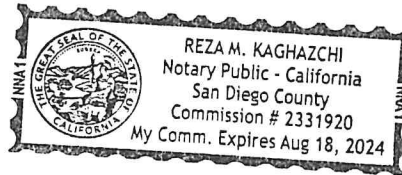
and they are all exceptional. The whole family. He was a true testament to the FDNY.


DONNA RUTH ATLAS

Sworn to before me this

14 day of April, 2022


Notary Public



Judith A. Becker

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
ELAINE E. MANDELKOW., et al.,

Plaintiffs,

**AFFIDAVIT OF
JUDITH A. BECKER**

20-CV-00315 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.
-----X

STATE OF NEW YORK)

: SS.:

COUNTY OF QUEENS)

JUDITH A. BECKER, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 148-26 29th Avenue Apt 21D, Flushing, NY 11354.

2. My current age is 67, having been born on September 10, 1954.

3. I am the wife of Arthur S. Becker, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My husband passed from liver cancer on July 2, 2012. It was determined by the World Trade Center Health Program that this illness was causally connected to his exposure to toxins resulting from the 9/11 terrorist attacks.

5. Arthur ("Artie") was a hard worker, and we had a good relationship. Everything was wonderful. He was an outgoing man who everyone loved. He was kind and gentle. Everything was great between our two families. We had the usual ups and downs, but everything was great until he got diagnosed.

6. On September 11, 2001, I was teaching daycare in my neighborhood. I worked from 8:00 am to 6:00 pm, and I opened the school on that day. When the attacks happened, parents were coming in frantically to pick up their children. I was nervous because I didn't know where my husband was. He was an EMT. Artie responded to the first attack on the World Trade Center in 1993 and even responded to Hurricane Katrina. At the daycare center, people were crying, coming to pick up their kids. I was just trying to do my job, but I was scared. I knew that it was my husband's calling from God to save people. He was down there every day in the days after 9/11, triaging victims. A lot of people he knew died in the collapse. The whole time, they were saying the air was safe. But I thought to myself, "How is that possible?" With all the fragments that had blown up from the building, the asbestos, and dust, I knew it couldn't be safe. I didn't see Arthur for three weeks straight.

7. Several years after 9/11, Artie started to become more tired. He'd come home from his job and not eat as much. But he kept it to himself, like he was holding something in. I knew something was wrong. He started to have stomach pain, and said, "Oh, I just have indigestion." When he was diagnosed with liver cancer in 2011, he was given a three-month prognosis to live without treatment. I stopped working to take care of him. It was terrible. We'd go back and forth by cab to Mount Sinai Hospital for treatment. So much time was spent in waiting rooms. He never complained once. When his colon failed, I had to learn how to change and clean his colostomy bag. They tried chemotherapy first, and then radiation. By that time, they realized there was nothing else that they could do. In June 2012, he went to the hospital for the last time.

8. As time wore on, he was mentally losing it. He would scream at the clouds, "God, take me now." I'm not sure if it was dementia but he was mentally deteriorating. He would yell and scream at me, telling me to leave him alone. I knew he wasn't mad at me, but that he was mad at his illness. I was staying strong because I had to take care of him. I kept track of everything—what time he woke up, when he went to the bathroom, how he was feeling, and when he took his medications. If I didn't have my faith, I wouldn't be here right now. It was so hard to watch him deteriorate down to nothing. He lost so much weight and was deformed with black marks all over him. It was terrible.

9. One of the last times he went to the hospital, we called the ambulance service. I'll never forget this. They came to pick him up, and the EMTs asked him, "are you Artie Becker?"

You were our teacher.” When we went to the hospital, all the doctors, nurses, and EMTs knew him. They told me he needed hospice care. I made sure he was blessed by a priest many times. All of our family came to say goodbye to him, and he died in my arms.

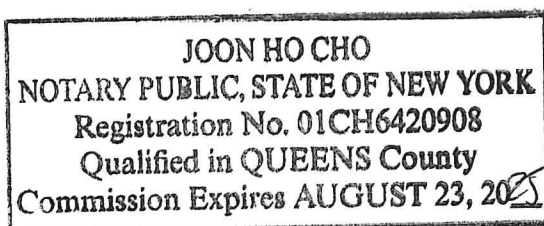
10. Artie was a hero. He gave his heart. He gave everything and asked for nothing in return. He left home on 9/11 not knowing if he’d ever see me again, but he still went. Before his mind started to go, he would watch recordings of the attacks on television. He would sit there and cry. He told me that he had to remember the attacks—even though he was dying as a result of it. Artie was the strongest man I know, and being an EMT was his calling from God. He had no regrets, and he said he would do it again. Three hundred people came to his wake.


11. As time went on, I went down to the new World Trade Center. It was hard for me, as I have fibromyalgia, anxiety and other medical issues. But we have to remember, always. Artie and I were married for thirty-two years, just shy of thirty-three years when he died. Whenever my dog sees an ambulance, he will bark and look for Artie. I was just proud to be his wife and to know him. I think it was God’s will. He did what he had to do.


JUDITH A. BECKER

Sworn to before me this
12th day of April, 2022


Notary Public





Craig Benson

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
ELAINE E. MANDELKOW., et al.,

AFFIDAVIT OF
CRAIG BENSON

Plaintiffs,

20-CV-00315 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF ORANGE)

CRAIG BENSON, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 8 Oxford Road, Goshen NY 10924.
2. My current age is 47, having been born on December 3, 1974.
3. I am the son of Charles Michael Benson, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. My father passed away from lymphoma on September 1, 2012. It was determined by the World Trade Center Health Program that this illness was causally connected to his exposure to toxins resulting from the 9/11 terrorist attacks.
5. As I matured, my father and I became much better friends. We did a lot of fishing, and we were both into wood working. It was nice to always have him around, and we would work on projects together. He had a house in Maine, which we often visited. We would go out for lunch together. It was a good relationship.

6. My father went down to the World Trade Center on September 12, 2001. He was a retired FDNY forensic photographer and went down to the site along with the photo unit. He volunteered to go down there and take pictures of the disaster site; they needed all the help they could get. He was there for about three to four weeks consistently after 9/11. He spoke vaguely about it to me.

7. My father was diagnosed with lymphoma in the summer of 2011. Basically, he just told me. We were together, face-to-face. It was tough news, but we tried to stay optimistic. I wanted to think positive for my dad. He seemed pretty healthy before his diagnosis, so we were surprised. Even when he was diagnosed, we didn't see any changes right away. Physically, we thought he could fight it. But he declined fast, within a year or so. He lost weight and became very weak. He was still optimistic, but we realized it wasn't looking good for him.

8. I was sad. You don't want to see your dad die. Deep inside, I knew his prognosis was not good. We first thought he beat the cancer, but it came right back. It developed so fast that we knew he wasn't going to come out of it. It was tough, for sure. Everyone dies, but you don't want it to happen like that. You prepare yourself the best you can. I took him to his doctors' appointments and tried to keep him in good spirits. More moral support than anything else.

9. He didn't get to enjoy a decent part of his life. He was shortchanged—he was only seventy-one years old. The hope is always that he'd live longer. He finally bought a new boat and didn't get a chance to use it. His quality of life was not good at the end. He really wanted to enjoy his retirement and he didn't get to. His death was a terrible loss for me.

Sworn to before me this
25 day of April, 2022

Notary Public


CRAIG BENSON

YISROEL MANNES
NOTARY PUBLIC-STATE OF NEW YORK
No. 01MA6355263
Qualified in Rockland County
My Commission Expires 03-06-2025

Patricia Benson

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

ELAINE E. MANDELKOW., et al.,

AFFIDAVIT OF
PATRICIA BENSON

Plaintiffs,

20-CV-00315 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK)

: SS.:

COUNTY OF ORANGE)

PATRICIA BENSON, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 267 Burlingham Road, Pine Bush NY 12566.

2. My current age is 79, having been born on November 30, 1942.

3. I am the wife of Charles Michael Benson, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My husband passed away from lymphoma on September 1, 2012. It was determined by the World Trade Center Health Program that this illness was causally connected to his exposure to toxins resulting from the 9/11 terrorist attacks.

5. It's been ten years since Charles passed, and every time I talk about him, I start crying. We had such a happy life. He was retired since 1988. We bought a home on a lake in Maine, which he loved to go to. He loved fishing, boating, and hunting. We loved going on vacations. We had tentatively planned to go on a river cruise with friends around the time that he was diagnosed. We loved to go out dining with friends. In the mornings, we'd meet up at

Panera Bread for coffee. We had sold our Maine residence and added a suite onto our daughter's home in Pine Bush, New York so we could be with her in our retirement. We were together a lot, and we were happy.

6. On September 11, 2001, I was at work. I couldn't believe my eyes at what I was seeing on television. I got on the phone with Charles, who was a retired forensic photographer for the FDNY. He said, "Patricia, I spoke to the photo unit, and I'm going down there to take pictures with them." So, he went down to the World Trade Center site on 9/12/2001. He was there for quite a long time, probably for weeks. He didn't have to go, but that was the type of man he was. We didn't talk much about what he saw. He told me it was horrific, but not much more. He was a man of few words.

7. In the spring of 2011, Charles told me he was having pain on the right and the left side of his stomach. He went to the doctor, and they sent him for tests. They said he had non-Hodgkin's lymphoma. I was devastated. But you never think it'll have a bad ending. You think you're going to beat it. Usually, this is a cancer that you can survive. So, we thought he'd be alright. He was a healthy person before he was diagnosed with lymphoma and always watched his diet. He started his chemotherapy in June 2011. By November 2011, his bloodwork showed that the lymphoma was gone. We were overjoyed, elated that it worked, and the doctor was so happy too. Life was good. The holidays came and went. We were with family. Everyone was happy.

8. In February 2012, we went back to the doctor for more bloodwork. The doctors told us that Charles's lymphoma was back with a vengeance. It was gut-wrenching. I remember coming out of the doctor's office after learning that. We got in the car, and I said, "Chuck, I don't want you to die." He said, "Patricia, I don't want to die." He had so much to live for.

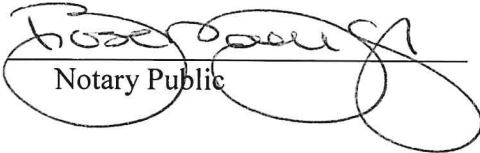
9. We went to other doctors to see if we could get a stem cell transplant, but none of the treatments would have been effective for him. The cancer had spread. He was getting progressively worse and worse. Towards the end, he was in the hospital. I took care of him in hospice for two weeks. Even through all of that, I didn't believe that he would die. I couldn't face the fact that this was the end. In the end, the doctors said there's nothing more that we can do.

10. Whenever I learn something new, good or bad, a fleeting thought comes to me, "Oh, I should tell Chuck." But he's not there for me to tell him. It's been almost ten years that

he's passed. It's hard to believe that he's gone. He didn't have to go down there after 9/11. But that was the type of person he was. He loved to help people. He was the fire safety officer in our town. When he died, they blocked off the street for his funeral because so many people attended. Hopefully, he is watching over us. If he didn't respond to the World Trade Center, he would be here today. But he had to go down there and do what he loved to do—helping people in whatever way he could.


PATRICIA BENSON

Sworn to before me this
13th day of April, 2022


Notary Public

ROSEMARIE LEE
Notary Public, State of New York
No. 01LE6018825
Qualified in Dutchess County
Commission Expires June 29, 2023

Melinda McCabe

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

ELAINE E. MANDELKOW., et al.,

**AFFIDAVIT OF
MELINDA MCCABE**

Plaintiffs,

20-CV-00315 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK)

: SS.:

COUNTY OF ORANGE)

MELINDA MCCABE, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 267 Burlingham Road, Pine Bush, NY 12566.

2. My current age is 48, having been born on June 9, 1973.

3. I am the daughter of Charles Michael Benson, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from lymphoma on September 1, 2012. It was determined by the World Trade Center Health Program that this illness was causally connected to his exposure to toxins resulting from the 9/11 terrorist attacks.

5. My dad and I were very close. A few years into his retirement, he and my mother built an extension on my home and moved in with us. I saw him every day, and he helped me raise my young children. He was very involved with our family, and especially with me and my kids. We would hang out and talk all the time. I loved that my dad lived right upstairs from me. We had a close and loving relationship.

6. At the time of September 11th, 2001, my father had just retired. As soon as he heard of the attacks on the World Trade Center, however, he rushed to volunteer. He was formerly a forensic photographer with the FDNY, and they needed help photographing the World Trade Center site. I think he started responding a day or two after the attacks. He described how horrific and devastating it was. It was shocking for him to see the pile of debris after the buildings came down. He said that one moment the towers were there and the next moment there was nothing, just dust and debris. I believe he was responding to Ground Zero for a couple of weeks.

7. Sometime around 2010, my father started to have a bad pain in his side. He wasn't feeling well overall. I remember the moment my mother called me and told me he had lymphoma. I was standing in the middle of Rite Aid. I was shocked. I hadn't noticed any difference in his condition. He seemed like a healthy person. In the beginning, we thought everything was going to be okay. We thought that he could beat the lymphoma. He went through chemotherapy for about a year. He would go down from Orange County to New York City for his treatments. The treatments got stronger and stronger each time. I remember he would go to his treatments, and when he came back, he was so exhausted and pained that he couldn't even walk. Chemotherapy sucked the life right out of him.

8. He was so sick. It was so hard to watch. My dad used to come down the stairs every morning to say, "Good morning!" to me and my children. Once he got sick, he couldn't even get down the stairs. I took care of him as much as I could. I also wanted to help my mother take care of him, as she was older and couldn't do it by herself. It was hard for me because I had two children to care for and I worked night shifts. But even when he was really sick, he would still wait for me to come home safely from my night shifts. Taking care of my father was my priority during the day. I fed him, changed his linens, and tried to keep him comfortable. We didn't want to put him in a nursing home. I was sitting with him on one of the last days before he died. He was looking out the window and said, "Melinda, I'm going." I didn't even think anything of it. The next day, he died.

9. My dad was the kind of person who would do anything for anybody. He loved to help. He knew he had to go down to the World Trade Center and help out the fire department. He didn't even think twice. It's just really sad that these illnesses are happening to so many people. I want to know that the people who suffered get some redemption. The families of those

lost to 9/11-related illnesses have carried a heavy financial and emotional burden. I think especially of the heavy emotional burden that my mother carried. It's a terrible thing that happened to people. It could have been completely avoided.


MELINDA MCCABE

Sworn to before me this
7th day of April, 2022



Notary Public

ANN MARIE DEVLIN
Notary Public - State of New York
No. 01DE6255747
Qualified in Orange County
My Commission Expires Feb. 6, 2024

Laura Ann Thomasberger

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

ELAINE E. MANDELKOW., et al.,

**AFFIDAVIT OF LAURA ANN
THOMASBERGER**

Plaintiffs,

20-CV-00315 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK)
 : SS.:
COUNTY OF ORANGE)

LAURA ANN THOMASBERGER, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 138 Seven Springs Road, Highland Mills, NY 10930.

2. My current age is 52, having been born on November 3, 1969.

3. I am the daughter of Charles Michael Benson, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from lymphoma on September 1, 2012. It was medically determined that this illness was causally connected to the toxins resulting from the September 11, 2001 terrorist attacks.

5. My father and I were quite close. I lived right down the road from him. We enjoyed summer vacations in Maine together and went fishing often. He was very involved in my life when I was younger. I remember that he would come to all my swim meets. As I got older, he would often babysit my kids. He was very involved in my children's lives as well. We

had a close relationship for sure.

6. On 9/11/2001, my father responded to the World Trade Center site to help look for survivors and dig through the rubble. He also took pictures of the site for forensic purposes. He didn't talk about it all too much. It was very emotional for him, because he was a fireman and many FDNY were lost in the rubble. He was responding to the World Trade Center site for at least a couple of weeks. It was hard for him to talk about. It was very upsetting for him.

7. I couldn't even believe it when he was diagnosed with lymphoma. It was in July 2010, and we were on vacation in Maine when we got the diagnosis. He went to the doctor, and his blood work results came back positive for lymphoma. At the time of his diagnosis, I hadn't noticed any changes in his health. He was still doing his daily activities as usual. We thought he'd be able to fight the lymphoma and that he had a good shot of recovering. But he started to change totally. He became weaker, and he lost his appetite as he went through the cancer treatments. He wasn't himself at all. He became depressed, because he couldn't "get up and go." He was frustrated.

8. We all tried to hold out hope that he was going to get better, get through this, and continue on with life. But that didn't happen. It was so upsetting. You always look at your dad as this strong person. He was someone who always did things for himself. Once he got sick, he wasn't able to enjoy his life the way he had always enjoyed it. Watching him become frail was hard because this wasn't the dad I knew growing up. Before his illness, he loved fishing, traveling, working around the house, boating, going out to dinner, and being with his friends. Now he couldn't enjoy that. He didn't want to need someone to help him bathe and eat. It was extremely upsetting to see this. You don't want to see your parents go through that.

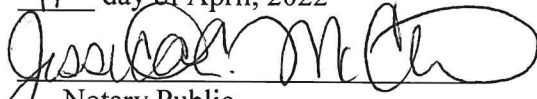
9. My dad was a wonderful person. He was a wonderful man, father, husband, and grandfather. He just cared about our family so much. He was a quiet and thoughtful, yet caring, person. He wanted to make sure that his family was always taken care of. He always put us first. There are no words to really express how I feel. It was a huge loss to all of us. I think about it, and it's hard to believe that he's not still here with us. I especially sympathize with my mother, who lost her best friend. My brother, sister, and I lost our father. He was always there for us. If

we needed help with something he was always there. He was taken too soon.



LAURA ANN THOMASBERGER

Sworn to before me this
11 day of April, 2022



Notary Public

State of NY County of Orange
Subscribed and sworn to (or affirmed) before me on this
11 day of April, 2022 by

Laura Ann Thomasberger proved to me on the basis
of satisfactory evidence to be the person(s) who appeared before me.

Notary Signature 

JESSICA C. MCCLENNAN
Notary Public, State of New York
Qualified in Orange County
No. 01MC6335781
Commission Expires January 19, 2024

Francine Pladino-Blaha

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

ELAINE E. MANDELKOW., et al.,

**AFFIDAVIT OF FRANCINE
PALADINO-BLAHA**

Plaintiffs,

20-CV-00315 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF FLORIDA)
 : SS.:
COUNTY OF PALM BEACH)

FRANCINE PALADINO-BLAHA, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 14192 Blackberry Drive, Wellington, FL 33414.

2. My current age is 63, having been born on February 2, 1959.

3. I am the wife of Mark Blaha, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My husband passed from metastatic bladder cancer on October 7, 2012. He was only 55 years old. It was medically determined that this illness was causally connected to the toxins resulting from the September 11, 2001 terrorist attacks.

5. Mark and I did everything together. We were married for thirty-one years. We were never apart. We vacationed together and did daily activities together. We were involved in every aspect of each other's lives. We were each other's best friends.

6. Mark worked for the Department of Sanitation and was called down to the World Trade Center for clean-up starting on 9/12/2001. He took pictures while he was there. It was just

mass destruction. He talked about the ashes being a foot high. So much dust, and so many people who were so distraught. What he witnessed was unbelievable. We are both from New York City and had seen the Twin Towers so many times over the years. We couldn't believe what had happened to it. It was hard to think of all the human life destroyed. Mark worked at the World Trade Center for approximately two weeks to one month. He was there every single day during that time.

7. Mark would see an orthopedist on a regular basis for his line of work, which involved regular heavy lifting. He was basically asymptomatic to the cancer in the early stages. In 2011, Mark went for a follow-up with his orthopedist, who requested an MRI. In the MRI, they saw a spot in the spine area of his neck. He was concerned about it and asked for a repeat MRI and a bone scan. Within hours of the bone scan returning, the orthopedist called us. The doctor asked us if we were both sitting down and told us that Mark had cancer everywhere. The cancer had started in his prostate and spread through his entire body.

8. I noticed some differences in Mark's health before the diagnosis, which I thought he should get checked out. He was having some discomfort in his scrotum area. I asked him on many occasions to see a doctor about it. He never went two years without a PSA test, but they didn't catch the prostate cancer. The prostate cancer eventually spread to his bladder, and then to his bones. The beginning of the end is when the cancer spread to his liver. At the time, we lived in Florida and Mark had both an oncologist and a urologist. The two doctors worked together to coordinate his care. They told me that they had never seen cancer so aggressive before, and they were confused why this would happen to an otherwise healthy man. That was before my husband told them he was a World Trade Center responder. Once they knew that, they said it made sense. The type of cancer he had changed as he got sicker.

9. I was one hundred percent Mark's caretaker when he got sick. He went through chemotherapy and radiation, and I went with him to all his appointments. He was on a catheter for urinary reasons. When that wasn't working anymore, they had to give him kidney bags that went into his kidney and back. I emptied those bags multiple times per day, every day. When he had his last chemotherapy treatment, he developed a scrotum infection. I had to attend to it every day, bathe him, and dry him. I cooked for him right up until he was too sick to eat any more. He had appetite loss and it got worse as the days rolled on. We cried together a lot. I never wanted to give up on him, and I didn't want him to go to a nursing home or hospice

facility. I took all his care on myself.

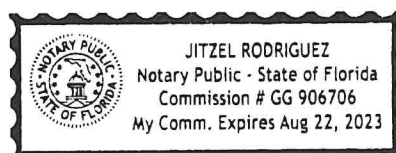
10. It was very hard to watch somebody that you love in that kind of pain and suffering, and in that emotional state of mind. Knowing that Mark had Stage IV cancer was just horrible. He was a happy guy and a jokester, and he was a person who everyone loved. My family loved him so much. To watch him lying in a hospital bed in our living room, getting worse and worse, was extremely hard. Even with my assistance, there came a point that he couldn't get out of bed anymore. Two days before he died, he told me he needed to go to the emergency room for oxygen. I begged him not to go, but he was still mentally sound. I called EMS for him, begging him not to leave right up until the last moment. But he was right. He ended up going to the hospital, and they found out that he had pneumonia. I had to make the horrible decision to take him off the respirator and put him in the hands of hospice. They gave him morphine to keep him comfortable; he wasn't even aware of his surroundings anymore. That was the end. He was dead within two days from sepsis.

11. We had just moved to Florida and bought a house here. I didn't have a single friend here except for him. He was the love of my life. It was a horrible time. I'm still suffering almost ten years later with this loss. I lost my best friend. It's always hard to talk about. When it comes back to me, I think of the horror of those days that my home turned into a nursing home. World Trade Center-related cancers took a healthy 55-year old man away from me, his family, our family, and our friends. We should never have had to suffer like that. I'm left alone. I was a widow at fifty-three. My life is never going to be the same. I don't see any happiness for me after Mark left. This had destroyed my life. I just spend time alone because I can't go out in public. I can't find happiness. This is not the way it was supposed to be. Whenever I think about the other people who have died on 9/11 and the first responders who are still dying, I feel sad that it never ends. I see it on Facebook every day—all the FDNY, NYPD, DOS members who are still dying from cancer. I just continue to pray for everyone who has gone through this. They know what I've been through.

Francine Paladino-Blaha
FRANCINE PALADINO-BLAHA

Sworn to before me this
19th day of April, 2022

Jitzel Rodriguez
Notary Public



Bette Francis Bohlmann

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
ELAINE E. MANDELKOW., et al.,

**AFFIDAVIT OF
BETTE FRANCIS BOHLMANN**

Plaintiffs,

20-CV-00315 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF MARYLAND)
 : SS.:
COUNTY OF WORCESTER)

BETTE FRANCIS BOHLMANN, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 81 Hingham Lane, Berlin, MD 21811.

2. My current age is 73, having been born on June 9, 1948.

3. I am the wife of John Bohlmann, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My husband passed from metastatic mesothelioma on October 29, 2017. It was determined by the World Trade Center Health Program that this illness was causally connected to his exposure to toxins resulting from the 9/11 terrorist attacks.

5. My husband and I married when I was seventeen years old, and we were married for fifty-three years before he died. He was my everything, my best friend, my lover, my life. We had a very active life. We had two children, and an unexpected third child in 1981. We did lots of family activities together. When the kids got older, we bought a boat and would travel all over Long Island with the boat. John would take blocks of time off to travel, but he never

missed a day at work. He was a Marine, and he was always very strong and tough. He never got sick. He was a very proud man. Prior to 9/11, we were thinking about his retirement. John had worked since he was 16 years old. We were looking forward to retirement and wanted to move, so we started to look at areas we could retire to. He wanted to take time to read books and be in nature. We found some property in Maryland by the water, where we brought our boat. We moved there in 2000.

6. John was a manager for an insulation installing company, and he worked mainly in downtown Manhattan. He almost lost his life in the first attack on the World Trade Center in 1993. He was supposed to meet with an engineer there, but he was late to the meeting. He was there when the bombs exploded. He always worked in the World Trade Center and the Marriott nearby. There were always renovations going on. When the attacks happened on 9/11/2001, John immediately began working on the clean-up. He worked for eighteen months at the World Trade Center and in the surrounding area. He was responsible for wrapping all the phone lines above ground so they could get the stock market up and running again. I went down there once with him. The destruction was unbelievable.

7. In 2003, John retired, and we moved to Maryland full time. In 2004, he began to have issues with his prostate. He had esophageal problems and had difficulty swallowing and keeping food down. He had to undergo esophageal dilations several times. By late 2013, I began to notice major changes in his breathing, energy level, and ability to walk. I made appointments for my husband with the cardiologist and pulmonologist to figure out why his breathing was so impaired. Doctors found asbestos scarring on his left lungs.

8. I always knew that his asbestos scarring could turn into cancer at any point. It was scary. We spent a lot of time with doctors, and our lives became medically focused. I spent nights awake, worrying about the risk of cancer and the pain John was experiencing. He couldn't sleep on his side because of the pain in his lower left lung. Every day, his pain was getting worse and worse. It was excruciating watching him suffer. We still didn't have a confirmed diagnosis, because the biopsies were coming back as "undefined carcinoma." It was horrible watching a vibrant man begin to dissipate. He couldn't sleep or eat. I had to take on major physical responsibilities as his primary caretaker, and I developed major tears in my right shoulder from lifting him.

9. Once they opened him up for surgery in 2017, it was hell knowing that he wouldn't last. I had to push him around in a wheelchair, he could barely function. He was on oxygen, and we had to carry him to the bathroom. My children were trying to help. We had so many emergency trips to the hospital, it was traumatizing. Watching him suffer was just awful for my children and me. John died in my son Danny's home.

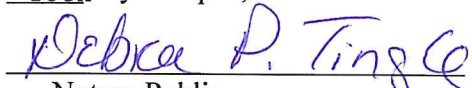
10. My son Danny sold his home because his father died in it. It was a very difficult time for my family and me. It's very, very hard to talk about. I connected to those towers. Any time the World Trade Center was mentioned, it would send me spiraling. I was never officially diagnosed with PTSD, but still to this day I feel its effects. When they did the 9/11 Memorial, I went with my daughter to the site. My daughter and I put John's picture on one of the gales. It was difficult to visit even twenty years later.

11. Someone has to take responsibility for the lives lost, even if it is monetary responsibility. John's life mattered to me and my children. He was stolen from all of us, especially me. I try to be stoic for my children. For two and a half years, I was in a very dark place. I lost the only person that I loved all my life. What I wanted in life was to be with him. I cried all the time, day and night, but I kept my suffering to myself. When you lose someone, an emptiness grows inside of you, especially when you lose the person you build your life around.


BETTE FRANCIS BOHLMANN

Sworn to before me this

18th day of April, 2022


Notary Public

My Commission Expires: Oct. 7, 2024

Daniel W. Bohlmann

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
ELAINE E. MANDELKOW., et al.,

Plaintiffs,

AFFIDAVIT OF
DANIEL BOHLMANN

20-CV-00315 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF SUFFOLK)

DANIEL BOHLMANN, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 105 Weatherby Lane, Central Islip, NY 11722.

2. My current age is 40, having been born on May 28, 1981.

3. I am the son of John Bohlmann, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed from metastatic mesothelioma on 10/29/2017. It was medically determined that this illness was causally connected to the toxins resulting from the September 11, 2001 terrorist attacks.

5. My dad was my number one. I was always closer to him than anyone else. We had a very close relationship. He was my go-to for advice, and we would talk every day even though he was retired in Maryland, and I lived on Long Island. He would come to visit me, and we would go on long walks together. We had a close relationship from the time of my childhood all the way to his passing. I was the “unexpected baby” of the family, and my brother

and sister were much older than me. My father was able to spend a lot more time with me. He meant everything to me.

6. I remember everything about 9/11/2001. I was an assistant manager at K-Mart, and I heard that the towers were going down. I knew that my dad was going to respond to the World Trade Center with my brother Johnny. My dad was a supervisor for the local insulation installers union. I remember calling my father that night, and he was so upset that he couldn't even talk to me. My dad was in the Twin Towers that very morning, for a job he was checking in on. Luckily enough for him, he left before the planes hit the towers. Every day for three months after 9/11, my father would go down to the site to supervise. He was exposed to all the dust and debris in the air. He had always been a healthy man. He got colds maybe once every three years. He would never call out of work for sickness.

7. For my father's eightieth birthday in July, we went on a road trip to North Carolina together. He was having some pain in his back, but he didn't have a diagnosis yet. During the trip, we went together on a scuba excursion to a World War II shipwreck, which my dad enjoyed because he was a former Marine. I remember watching him sitting on the boat, realizing that he didn't look like he was in good health. He was getting scans every six months, but they weren't picking up the cancer at first. The back pain ended up being the mesothelioma that he contracted from his exposure at the World Trade Center. I was there with him when he received the diagnosis. It was the hardest thing you could hear—that he had a mass in his lungs, and the doctors needed to remove it. My parents signed my father up for the World Trade Center Health program, and he started to receive treatment in New York.

8. My parents moved from Maryland into my home on Long Island in October 2017, so that my father could be closer to New York for his treatment. I was with him for every doctor's appointment, and I took him back and forth from the hospital. My parents decided on surgery to remove the mass in his lungs. We dropped him off at the hospital in New York, and the doctors told us the surgery should take seven or eight hours. My mother received a phone call from the hospital after three hours. The doctors said, "We're stopping the surgery." The cancerous mass had grown so large. There was nothing they could do. It would have been too risky to remove it all. The doctors gave him a three-to-six-month prognosis. He returned home, barely able to walk with a cane or a walker. Within two days, I had to call 9-1-1 because my father couldn't breathe in the middle of the night.

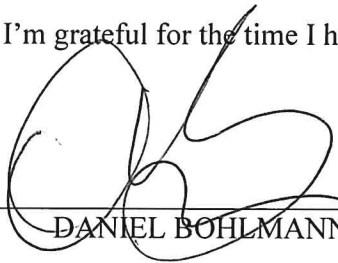
9. My father stayed in the hospital for a few days, where he was given pain medication. My mother, siblings, and I had a hard decision to make: either put him in hospice care or take him home. We decided to take him home. My husband and I set up a bed for my father in our living room. We brought in hospice nurses and an oxygen tank. It was surreal, seeing my living room be turned into a makeshift hospice facility. At that point, I took over care of my father from my mother. She was losing her husband of fifty years, and she wasn't of sound emotional mind. Preparing for his death was hard. I would have to walk my father to the bathroom, clean him, give him his medicine, and feed him until he no longer wanted to eat. My father let my husband take care of him as well, and he adored him. Three days before he passed, I convinced him to leave the house. We took him to his favorite diner. It was hard to get him in and out of the car with his oxygen tank, but I knew he needed it. He loved to be outdoors.

10. I remember the night he died. My mother had neck pain, so she slept in the bed while I slept on the couch next to my father's hospital bed in the living room. I fell asleep holding my father's hand. I had set a timer for 2:00 am to give him his pain medication. I got up to give him his pain medication, but when I woke up, he was gone. It was a blessing to know that he left his life with a loved one. But it was also a curse that it happened in my home. His death haunted me for a long time, and I couldn't live with those memories in my home every day. I ended up selling the house.

11. As well as emotional hardships, there were also financial hardships around my father's death. I was a manager at Trader Joe's at the time, and they did not give me any bereavement pay. I was getting paid by the hour at that point. Usually, I worked fifty hours per week, but I had to scale back to twenty or twenty-five hours per week when my father got sick. I lost a significant amount of money between the month that he lived in my home and the funeral. I tried to use vacation pay to supplement my lost income. I also had to dip into my savings to pay for the mortgage on my home at the time.

12. My dad was an amazing father and loving husband to my mother for fifty years. They had a "story book" marriage. I've been with my husband for sixteen years, and I couldn't imagine fifty years. I had such a close bond with my dad. My dad was the "ear," the one I could always talk to. I have his flag in the corner of my room, pictures of us together, and a jar with his ashes. He's with me every day, and sometimes I see him in my dreams. There's not a day that goes by where I don't think of him. My dad should have lasted to be 100 years old. To see

him perish so fast from the mesothelioma wasn't right. I'm grateful for the time I had with him.
It went so fast. You can't get that time back.



DANIEL BOHLMANN

Sworn to before me this
1st day of April, 2022



Notary Public

KURT M. BOGDAHN
Notary Public, State of New York
No. 01BO6306743
Qualified in Suffolk County
Commission Expires June 23, 2022

John Peter Bohlmann

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

ELAINE E. MANDELKOW., et al.,

**AFFIDAVIT OF
JOHN PETER BOHLMANN**

Plaintiffs,

20-CV-00315 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK)

: SS.:

COUNTY OF SUFFOLK)

JOHN PETER BOHLMANN, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 580 Benjamin Road, North Babylon, NY 11703.

2. My current age is 53, having been born on March 22, 1969.

3. I am the son of John Bohlmann, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from metastatic mesothelioma on October 29, 2017. It was medically determined that this illness was causally connected to the toxins resulting from the September 11, 2001 terrorist attacks.

5. My father was very involved in my life. We have a long work history together. We worked together in construction, and then my dad became the supervisor of a company. We had a great relationship outside of work too. We would do activities together, travel, and go for walks. I'd visit him in Maryland, and we would go fishing. We were very active and involved in each other's lives.

6. I worked for Polytherm Construction, and my father was a supervisor. We were down at the World Trade Center site starting a few days after 9/11/2001, and we were working on the site for a little over a year. My dad would work at the site all day, overseeing his employees, talking with other contractors, and making sure our materials were good quality. He worked on the site twice per week for about a year.

7. Years later, my dad started to feel pain in his ribcage. He went to the doctor because he thought he had pulled a muscle in his ribs. They diagnosed him with mesothelioma. It was really sudden, and he was given three to six months to live. It's hard for me to think about, and I push it to the back of my mind. I was shocked to learn of his diagnosis because he was such an active and healthy person before the mesothelioma started progressing. Honestly, I didn't notice anything different. But I remember right before he got diagnosed, I visited him in Maryland, and he asked me to power wash his house. That was a red flag for me, because otherwise he would've been able to do it himself. He was the kind of person that didn't like to be helped. He wanted to do everything himself.

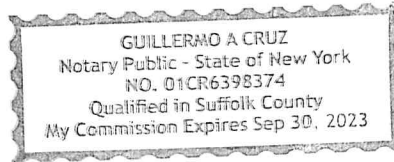
8. When he was diagnosed, he started to get fatigued very easily. I know they tried to operate on him, but when they opened him up the mesothelioma had spread everywhere. There was nothing they could do. He couldn't go for chemotherapy or radiation because his body was too weak, and it wouldn't have helped him. My family didn't want to put him in hospice. My brother lived in West Babylon, which was near where I lived. I went back and forth between work to see my dad as much as I could while he was living at my brother's house. I would try to help out my family. I would leave work early whenever I could. I would take him to do something he loved, like getting a Nathan's hot dog. I don't know how many days or weeks passed while I was taking care of my dad. It was an ongoing thing. I'm in construction, so the hours you work are the hours you get paid for. But I didn't care about the loss of income. I wanted to spend time with my father. It was so painful to watch him with that type of illness. It was hard to see him struggle to breathe. He was gasping for breath right before he died. It was hard to watch.

9. My father loved life. He lived life to the fullest. He was a great man, and he didn't judge people. He got along with everyone on the construction site. It's painful even to talk about it now. I know he's looking down on me and looking after our family. What happened on 9/11 was a tragedy. I think about all the stuff we had to breathe in. I'm looking at a mirror of what I

could one day be going through. Who knows if I'm going to go through the same illness that my father did? A two-hundred and ten-story building full of asbestos and debris was pummeled to ashes, and we were breathing all of that in.


JOHN PETER BOHLMANN

Sworn to before me this
12th day of April, 2022




Notary Public